

William H. Schwarzschild, III (VSB No. 15274)

R. Joseph Noble (VSB No. 77138)

WILLIAMS MULLEN

Two James Center, 17th Floor

1021 East Cary Street

Post Office Box 1320

Richmond, Virginia 23218-1320

Tel: 804.783.6489

Fax: 804.783.6507

tschwarz@williamsmullen.com

jnoble@williamsmullen.com

*Counsel for Vonage Marketing, LLC*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)**

---

In re:	)	
	)	Chapter 11
CIRCUIT CITY STORES, INC., et al.,	)	
	)	Case No. 08-35653-KRH
Debtors.	)	
	)	(Jointly Administered)
	)	

---

**RESPONSE OF VONAGE MARKETING, LLC  
TO DEBTORS' TWENTY-THIRD OMNIBUS OBJECTION TO CLAIMS  
(MODIFICATION OF CERTAIN DUPLICATE 503(b)(9) CLAIMS)**

Vonage Marketing, LLC (formerly doing business as Vonage Marketing, Inc.) ("Vonage"), by counsel, hereby responds to the Debtors' Twenty-Third Omnibus Objection to Claims (Modification of Certain Duplicate 503(b)(9) Claims) (the "Objection") as follows:

1. On or about December 19, 2008, Vonage timely filed a claim (designated Claim No. 1056) in the amount of \$69,022.58 in accordance with the procedures governing the filing of claims entitled to priority under 11 U.S.C. § 503(b)(9) in this case for goods sold to Circuit City Stores, Inc. ("Circuit City") in the ordinary course of Circuit City's business and received by Circuit City within 20 days before the date of the commencement of this case. A copy of Claim No. 1056 is attached hereto as Exhibit A.

2. On or about January 29, 2009, Vonage timely filed a secured claim (designated Claim No. 8012) in the amount of \$555,979.26. A copy of Claim No. 8012 is attached hereto as Exhibit B.

3. On or about June 23, 2009, the Debtors filed the Objection.

4. The Objection asserts that Claim No. 8012 is duplicative of Claim No. 1056 with respect to the 503(b)(9) portion of Claim No. 8012 in the amount of \$69,022.58.

5. Vonage acknowledges that the portion of Claim No. 8012 entitled to priority under 11 U.S.C. § 503(b)(9) is duplicative of Claim No. 1056 filed pursuant to the procedures established by the court governing the filing of claims entitled to priority under 11 U.S.C. § 503(b)(9).

6. Vonage does not seek duplicative payment under Claim No. 8012 for the same amounts sought under Claim No. 1056, however Vonage asserts that the character of the two claims is different. To the extent that Claim No. 8012 is not treated as a secured claim under 11 U.S.C. § 506(a), Vonage asserts that it is entitled to priority under 11 U.S.C. § 503(b)(9) up to \$69,022.58.

7. Attached hereto as Exhibit C is the Declaration of John S. Rego, Treasurer of Vonage, who has personal knowledge of the facts that support this Response.

WHEREFORE Vonage prays that (i) Claim No. 1056 be allowed in an amount no less than \$69,022.58 with priority pursuant to 11 U.S.C. § 503(b)(9) of the Bankruptcy Code to the extent not allowed as a secured claim pursuant to 11 U.S.C. § 506(a); (ii) Claim No. 8012 be allowed as a secured claim pursuant to 11 U.S.C. § 506(a) in the amount of \$555,979.26, subject to the limitations set forth above; (iii) the Objection be overruled to the extent that it seeks disallowance of any portion of Claim No. 1056 or Claim No. 8012 except as otherwise

acknowledged herein; and (iv) Vonage be granted a hearing and such other relief as may be appropriate and as its interests may appear.

Dated: Richmond, Virginia  
July 16, 2009

**VONAGE MARKETING, LLC**

*/s/ William H. Schwarzschild, III*

By: \_\_\_\_\_  
Counsel

William H. Schwarzschild, III - VSB No. 15274  
R. Joseph Noble – VSB No. 77138  
WILLIAMS MULLEN  
Two James Center, 17th Floor  
1021 East Cary Street  
Post Office Box 1320  
Richmond, Virginia 23218-1320  
Phone: 804.783.6489  
FAX: 804.783.6507  
[tschwarz@williamsmullen.com](mailto:tschwarz@williamsmullen.com)  
[jnoble@williamsmullen.com](mailto:jnoble@williamsmullen.com)

*Counsel for Vonage Marketing, LLC*

6555154\_3.DOC

**EXHIBIT A**

[Claim No. 1056]

United States Bankruptcy Court  
Eastern District of Virginia  
Richmond Division

DEADLINE FOR  
FILING 503(b)(9)  
CLAIMS  
5:00 P.M. Pacific Time  
December 19, 2008

Section 503(b)(9) Claim Request Form

Circuit City Stores, Inc., et al., Claims Processing c/o Kurtzman Carson Consultants LLC, 2335 Alaska Avenue, El Segundo, CA 90245	Circuit City Stores, Inc., et al. Case Nos. 08-35653 through 08-35670 Chapter 11 Jointly Administered
<p><b>NOTE:</b> Pursuant to an Order of the Bankruptcy Court in the above-referenced chapter 11 cases (see Docket No. 107), to have claims allowed as administrative expense under 11 U.S.C. § 503(b)(9), this form must be served upon Circuit City Stores, Inc., et al., Claims Processing, c/o Kurtzman Carson Consultants LLC, 2335 Alaska Avenue, El Segundo, CA 90245 by December 19, 2008, the Bar Date for Section 503(b)(9) claims in the above-referenced cases. The form may be submitted in person or by regular mail, overnight mail, or hand delivery. Facsimile, email or electronic submissions will not be accepted. Requests shall be deemed filed when actually received by Kurtzman Carson Consultants LLC.</p>	
<p>Name and Address of Creditor: <i>(The person or other entity to whom the debtor owes money or property)</i></p> <p><i>Vonage Marketing Inc.</i></p> <p>Telephone: <u>732-226-4187</u> Fax: <u>732-202-5221</u></p> <p>Name and address where notices should be sent (if different from above)</p> <p><b>COPY</b></p> <p>Telephone: _____ Fax: _____</p>	<p><input type="checkbox"/> Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.</p> <p><input type="checkbox"/> Check box if you have made any demand(s) to reclaim goods sold to the debtor under 11 U.S.C. § 546(c). (attach copies of any such demand(s))</p> <p><input type="checkbox"/> Check box if you have transferred the rights of your claim to any third party. If so please list name of transferee:</p> <p><input type="checkbox"/> Check box if you have never received any notices from the bankruptcy court in this case.</p> <p>Debtor against which claim is asserted: (Check one box below:)</p> <p><input checked="" type="checkbox"/> Circuit City Stores, Inc. (Tax I.D. No. 54-0493875)  <input type="checkbox"/> Abbott Advertising, Inc. (Tax I.D. No. 54-1624659)  <input type="checkbox"/> Circuit City Stores West Coast, Inc. (Tax I.D. No. 95-4460785)  <input type="checkbox"/> CC Distribution Company of Virginia, Inc. (Tax I.D. No. 54-1712821)  <input type="checkbox"/> Circuit City Properties, LLC (Tax I.D. No. 54-0793353)  <input type="checkbox"/> Patapsco Designs, Inc. (Tax I.D. No. 52-1086796)  <input type="checkbox"/> Ventoux International, Inc. (Tax I.D. No. 20-1071838)  <input type="checkbox"/> Sky Venture Corporation (Tax I.D. No. 54-1760311)  <input type="checkbox"/> Prahs, Inc. (n/a)  <input type="checkbox"/> XS Stuff, LLC (Tax I.D. No. 54-2029263)  <input type="checkbox"/> Kinzer Technology, LLC (Tax I.D. No. 54-2022157)  <input type="checkbox"/> Circuit City Purchasing Company, LLC (Tax I.D. No. 20-0995170)  <input type="checkbox"/> Orbyx Electronics, LLC (Tax I.D. No. 20-1203360)  <input type="checkbox"/> InterTAN, Inc. (Tax I.D. No. 75-2130875)  <input type="checkbox"/> CC Aviation, LLC (Tax I.D. No. 20-5290841)  <input type="checkbox"/> Courchevel, LLC (n/a)  <input type="checkbox"/> Circuit City Stores PR, LLC (Tax I.D. No. 66-0695512)  <input type="checkbox"/> Mayland MN, LLC (Tax I.D. No. 20-0896116)</p>
ACCOUNT OR OTHER NUMBER BY WHICH CREDITOR IDENTIFIES DEBTOR: <u>5035</u>	Check here if this claim <input type="checkbox"/> replaces <input type="checkbox"/> amends a previously filed claim, dated: _____
<p>1. BASIS FOR CLAIM: Goods received by the Debtor within 20 days before the date of commencement of the case. Value of Goods: \$ <u>69,022.58</u>.</p> <p>2. DATE OF SHIPMENT: <u>See Attached</u> METHOD OF SHIPMENT: <u>See Attached</u> DATE OF RECEIPT: <u>See Attached</u> NAME OF CARRIER: <u>See Attached</u> PLACE OF DELIVERY: <u>see attached</u></p> <p>3. TOTAL AMOUNT OF SECTION 503(b)(9) CLAIM: \$ <u>69,022.58</u> <input type="checkbox"/> Check the box if claim includes interest or other charges in addition to the principal amount of the claim. Attach itemized statement of all additional charges.</p> <p>4. BRIEF DESCRIPTION OF CLAIM: <u>Delivery of Devices Sold</u> Describe goods sold: <u>Telephone Adapters for use with Vonage Services</u> <i>Attach support for your claim.</i></p> <p>5. CREDITOR'S STATEMENT: <u>I am the sole plaintiff in this claim. This claim has been reduced and modified for the purpose of making the claim. In filing this claim, I understand it is subject to automatic stay and other relevant laws.</u> <u>see attached</u></p> <p>6. SUPPORTING DOCUMENTS: <u>Attach copies of supporting documents</u>, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, or contracts. DO NOT SEND ORIGINAL DOCUMENTS. If the documents are not available, explain. If the documents are voluminous, attach a summary. Attachments must be printed on 8-1/2" by 11" paper.</p> <p>7. DATE-STAMPED COPY: To receive an acknowledgement of the filing of your claim, enclose a stamped, self-addressed envelope and copy of this claim request form.</p> <p>8. ORDINARY COURSE CERTIFICATION: By signing this claim request form, you are certifying that the goods for which payment is sought hereby, were sold to the debtor in the ordinary course of the debtor's business as required by 11 U.S.C. § 503(b)(9).</p> <p><i>Penalty for presenting fraudulent claim:</i> Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.</p>	
Date <u>12/18/08</u>	FOR COURT USE ONLY  <b>RECEIVED</b> <b>DEC 19 2008</b> <b>KURTZMAN CARSON CONSULTANTS</b>
Sign and print the name and title, if any, of the creditor or other person authorized to file this claim (attach copy of power of attorney, if any)	
<i>Dianeque Electra, Vice President-LAW</i>	

**Circuit City Stores, Inc., et al.  
Case No. 08-35653**

**Attachment to Section 503(b)(9) Claim Request Form**

A. Background. Vonage Marketing Inc. ("Claimant") is a supplier of the Debtor and delivered goods reflected on the attached sheets that were received by the Debtor during the 20-day period prior to the commencement of this case. Attached is a summary of all claims for delivered goods. Further information shall be provided upon request.

B. Amount of Claims; Supplementation. The Company has paid no portion of the claims asserted in this Claim Request Form (the "Claims"). Upon information and belief, some or all of the Claims may be subject to valid setoff, counterclaim or recoupment. Claimant does not waive its right to the payment of costs, charges or expenses asserted in or associated with the Claims. Claimant further reserves the right to amend and supplement this Claim Request Form and to file other claims that may be timely filed during the course of this case.

D. No Judgment. No judgment has been rendered on the Claims presented herein.

E. Secured and Priority Status. No security is held for the Claims presented herein except to the extent that Claimant has a right of setoff with respect to the Claims. Claimant claims administrative priority status with respect to the Claims pursuant to 11 U.S.C. § 503(b)(9).

F. Reservation of Rights. Submission of this Claim Request Form is filed under compulsion of a bar date set in this case with respect to claims arising under 11 U.S.C. § 503(b)(9) and is filed to protect Claimant from forfeiture of certain of its claims by reason of said bar date. Filing of this Claim Request Form is not and should not be construed to be: (a) a waiver or release of Claimant's rights against any other entity or person liable for all or part of any claim described herein; (b) a consent by Claimant to the jurisdiction of this Court with respect to any proceeding commenced in this case against or otherwise involving Claimant; (c) a consent by Claimant to the treatment of any non-core claim against it as a core claim; (d) a waiver of the right to withdraw the reference with respect to the subject matter of these Claims, any objection or other proceedings commenced with respect thereto, or any other proceedings commenced in this case against or otherwise involving Claimant; (e) a waiver of any right to the subordination, in favor of Claimant, of indebtedness or liens held by creditors of the Company; or (f) an election of remedy which waives or otherwise affects any other remedy of Claimant. Claimant expressly reserves the right to amend or supplement this Claim Request Form in any respect, and to file additional proofs of claim for any additional claim or claims with respect to any other claim or claims that Claimant may have against the Debtor or any of its affiliates.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Page 1

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Page 5

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Vonage Marketing Inc. 503(b)(9) Claim re Circuit City Stores Inc.

Page 25

**EXHIBIT B**

[Claim No. 8012]

# COPY

B 10 (Official Form 10) (12/08)

UNITED STATES BANKRUPTCY COURT      Eastern District of Virginia		PROOF OF CLAIM	
Name of Debtor: <b>Circuit City Stores, Inc.</b>	Case Number: <b>08-35853</b>		
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.			
Name of Creditor (the person or other entity to whom the debtor owes money or property): <b>Vonage Marketing LLC (f/k/a Vonage Marketing, Inc.)</b>	<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim.		
Name and address where notices should be sent: <b>Vonage Marketing, LLC Attn: Angelique Electra, Vice President - Law (See Addendum) 23 Main Street Holmdel, NJ 07728</b>	Cont'l Claim Number: _____ <i>(If known)</i>		
Telephone number: <b>(732) 226-4187</b>	Filed on: _____		
Name and address where payment should be sent (if different from above):	<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.		
Telephone number:	<input type="checkbox"/> Check this box if you are the debtor or trustee in this case.		
1. Amount of Claim as of Date Case Filed: \$ <b>555,979.26</b>	5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount.		
If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4.	Specify the priority of the claim.		
If all or part of your claim is entitled to priority, complete item 5.	<input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B).		
<input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest or charges.	<input type="checkbox"/> Wages, salaries, or commissions (up to \$10,950*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. §507 (a)(4).		
2. Basis for Claim: <b>Goods Sold</b> <i>(See instruction #2 on reverse side.)</i>	<input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. §507 (a)(5).		
3. Last four digits of any number by which creditor identifies debtor: <b>5326</b>	<input type="checkbox"/> Up to \$2,425* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. §507 (a)(7).		
3a. Debtor may have scheduled account as: _____ <i>(See instruction #3a on reverse side.)</i>	<input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. §507 (a)(8).		
4. Secured Claim <i>(See instruction #4 on reverse side.)</i> Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information.	<input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. §507 (a) _____		
Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input checked="" type="checkbox"/> Other Describe: Value of Property: \$ _____ Annual Interest Rate _____ %	Amount entitled to priority: \$ _____		
Amount of arrearage and other charges as of time case filed included in secured claim, If any: \$ _____ Basis for perfection: _____	*Amounts are subject to adjustment on 4/1/10 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.		
Amount of Secured Claim: \$ <b>555,979.26</b> Amount Unsecured: \$ <b>0.00</b>			
6. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim.			
7. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. <i>(See instruction 7 and definition of "redacted" on reverse side.)</i>			
DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.			
If the documents are not available, please explain:			
Date: <b>1/28/09</b>	Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.		FOR OFFICIAL USE ONLY <b>RECEIVED</b> JAN 29 2009
Vonage Marketing, LLC by <b>Henry B. Dickens</b> its <b>Asst. Secretary</b>			

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. § 152, 28 U.S.C. § 1828.

**ADDENDUM TO CLAIM OF  
VONAGE MARKETING LLC**

**Circuit City Stores, Inc., et al.  
Case No. 08-35653**

A. Background. Vonage Marketing LLC (f/k/a Vonage Marketing Inc.) ("Claimant") is a supplier of the Debtor and delivered goods reflected on the attached invoices and/or summaries.

B. Amount of Claim; Supplementation. The Debtor has paid no portion of the claims asserted in this Proof of Claim (the "Claim"). Upon information and belief, the Claim is subject to valid setoff, counterclaim or recoupment. Claimant does not waive its right to the payment of costs, charges or expenses asserted in or associated with the Claim. Claimant further reserves the right to amend and supplement this Claim.

C. No Judgment. No judgment has been rendered on the Claim presented herein.

D. Secured and Priority Status. The Claim presented herein is secured pursuant to 11 U.S.C. § 506(a)(1) to the extent of Claimant's valid right of setoff or recoupment with respect to the Claim. Claimant asserts a right of setoff or recoupment with respect to the full amount of the Claim.

E. Reservation of Rights. Submission of this Claim is filed under compulsion of a bar date set in this case and is filed to protect Claimant from forfeiture of certain of its claims by reason of said bar date. Filing of this Claim is not and should not be construed to be: (a) a waiver or release of Claimant's rights against any other entity or person liable for all or part of any claim described herein; (b) a consent by Claimant to the jurisdiction of this Court with respect to any proceeding commenced in this case against or otherwise involving Claimant; (c) a consent by Claimant to the treatment of any non-core claim against it as a core claim; (d) a waiver of the right to withdraw the reference with respect to the subject matter of this Claim, any objection or other proceedings commenced with respect thereto, or any other proceedings commenced in this case against or otherwise involving Claimant; (e) a waiver of any right to the subordination, in favor of Claimant, of indebtedness or liens held by creditors of the Company; or (f) an election of remedy which waives or otherwise affects any other remedy of Claimant. Claimant expressly reserves the right to amend or supplement this Claim in any respect, and to file additional proofs of claim for any additional claim or claims with respect to any other claim or claims that Claimant may have against the Debtor or any of its affiliates.

F. Notices. All notices concerning this proof of claim shall be sent to:

Vonage  
Angelique Electra  
Vice President - Law  
23 Main Street  
Holmdel, NJ 07733  
Tel.: (732) 226-4187

**EXHIBIT C**

[Declaration of John S. Rego, Treasurer]

William H. Schwarzschild, III (VSB No. 15274)  
W. Alexander Burnett (VSB No. 68000)  
WILLIAMS MULLEN  
Two James Center, 17th Floor  
1021 East Cary Street  
Post Office Box 1320  
Richmond, Virginia 23218-1320  
Tel: 804.783.6489  
Fax: 804.783.6507  
tschwarz@williamsmullen.com  
aburnett@williamsmullen.com

*Counsel for Vonage Marketing, LLC*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)**

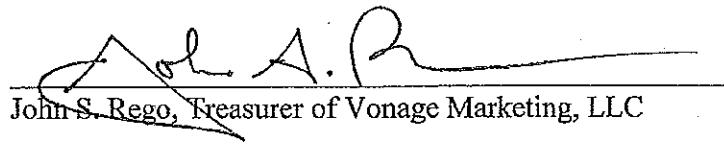
In re: )  
CIRCUIT CITY STORES, INC., et al., ) Chapter 11  
Debtors. ) Case No. 08-35653-KRH  
 ) (Jointly Administered)  
)  
)

**DECLARATION OF JOHN S. REGO, TREASURER  
OF VONAGE MARKETING, LLC**

I, John S. Rego, Treasurer of Vonage Marketing, LLC (formerly doing business as Vonage Marketing, Inc.), hereby declare as follows:

1. I have reviewed the Response of Vonage Marketing, LLC to Debtors' Twenty-Third Omnibus Objection to Claims (Modification of Certain Duplicate 503(b)(9) Claims) (the "Response").
2. I am personally aware of the information set forth in the Response.
3. The Response is true and correct to the best of my information and belief.

Date: July 15, 2009

  
John S. Rego, Treasurer of Vonage Marketing, LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing Response of Vonage Marketing, LLC to Debtors' Twenty-Third Omnibus Objection to Claims (Modification of Certain Duplicate 503(b)(9) Claims) was served this 16th day of July, 2009, via email and by first class mail, postage prepaid, upon:

**Dion W. Hayes**

McGuireWoods LLP  
One James Center, 901 E. Cary St.  
Richmond, VA 23219  
[dhayes@mcguirewoods.com](mailto:dhayes@mcguirewoods.com)

**Jeffrey N. Pomerantz**

Pachulski Stang Ziehl & Jones LLP  
10100 Santa Monica Blvd., Suite 1100  
Los Angeles, CA 90067  
[jpomerantz@pszjlaw.com](mailto:jpomerantz@pszjlaw.com)

**Douglas M. Foley**

McGuireWoods LLP  
9000 World Trade Center, 101 W. Main St.  
Norfolk, VA 23510  
[dfoley@mcguirewoods.com](mailto:dfoley@mcguirewoods.com)

**John D. Fiero**

Pachulski Stang Ziehl & Jones LLP  
150 California Street, 15th Floor  
San Francisco, CA 94111-4500  
[jfiero@pszjlaw.com](mailto:jfiero@pszjlaw.com)

**Ian S. Fredericks**

Skadden Arps Slate Meagher  
& Flom LLP  
One Rodney Sq.  
PO Box 636  
Wilmington, DE 19899  
[ian.fredericks@skadden.com](mailto:ian.fredericks@skadden.com)

**Lynn L. Tavenner**

Tavenner & Beran, PLC  
20 North Eighth Street, Second Floor  
Richmond, VA 23219  
[ltavenner@tb-lawfirm.com](mailto:ltavenner@tb-lawfirm.com)

**Chris L. Dickerson**

Skadden Arps Slate Meagher  
& Flom LLP  
333 West Wacker Drive  
Chicago, IL 60606  
[chris.dickerson@skadden.com](mailto:chris.dickerson@skadden.com)

**Paula S. Beran**

Tavenner & Beran, PLC  
20 North Eighth Street, Second Floor  
Richmond, VA 23219  
[pberan@tb-lawfirm.com](mailto:pberan@tb-lawfirm.com)

**Robert J. Feinstein**

Pachulski Stang Ziehl & Jones LLP  
780 Third Ave., 36th Floor  
New York, NY 10017  
[rfeinstein@pszjlaw.com](mailto:rfeinstein@pszjlaw.com)

**Robert B. Van Arsdale**

Office of the U. S. Trustee  
701 East Broad Street, Suite 4304  
Richmond, VA 23219  
[Robert.B.Van.Arsdale@usdoj.gov](mailto:Robert.B.Van.Arsdale@usdoj.gov)

**Brad R. Godshall**

Pachulski Stang Ziehl & Jones, LLP  
10100 Santa Monica Blvd, 11th Floor  
Los Angeles, CA 90067-4100  
[bgodshall@pszjlaw.com](mailto:bgodshall@pszjlaw.com)

**Adam M. Feinmesser, Esq.**

Esbin & Alter, LLP  
497 South Main Street  
New City, NY 10956  
[afeinmesser@esbinalter.com](mailto:afeinmesser@esbinalter.com)

/s/ *William H. Schwarzschild, III*  
By: \_\_\_\_\_  
William H. Schwarzschild, III

William H. Schwarzschild, III - VSB No. 15274

WILLIAMS MULLEN

Two James Center, 17th Floor

1021 East Cary Street

Post Office Box 1320

Richmond, Virginia 23218-1320

Phone: 804.783.6489

Fax: 804.783.6507

tschwarz@williamsmullen.com

*Counsel for Vonage Marketing, LLC*

6555154\_3.DOC